Mr. Stephen Nightingale
National Institute of Standards and Technology
Gaithersburg, MD

Dear Mr. Nightingale:

On behalf of the Information Technology Association of America (ITAA)[1], I would like to submit the following response to the request for information regarding IPv6 Test Materials for the United Stated Government issued as part of the meeting announcement on this subject (72 FR 19178). These comments are intended to make suggestions to NIST and the Federal government regarding testing and administrative frameworks and focus on the following points:

- Impending deadline makes creating a testing regimen difficult
- Lack of funding makes creating government testing problematic
- Third-party testing facilities are costly and cumbersome
- Designing and engineering products to new profiles for manufacturing will take time
- Industry has already made significant investments in testing and evaluating products
- Government should look to validate current testing
- Testing should be evolutionary as traffic grows

Industry does not believe that the looming implementation deadline provides sufficient time for the federal government to efficiently and cost-effectively establish a new, government-managed testing regimen for IPv6 products. Funding should also be a significant concern for NIST, since there have been almost no direct appropriations for IPv6 implementation. NIST would need to create sufficient urgency for such funding to be incorporated into the current appropriations process for FY2008 in order to have funds to implement a testing regimen. If NIST were to rely upon a fee structure to fund such a testing regimen, there is no funding in the FY 2007 or 2008 agency budgets currently dedicated to this task.

Another option raised in the request for information would be the identification of third-party testing facilities, but such identification and certification could only come on the heels of the adoption and socialization of the IPv6 profiles currently under development at NIST.

[1] ITAA provides global public policy, business networking, and national leadership to promote the continued rapid growth of the IT industry. ITAA consists of over 325 corporate members throughout the U.S. and a global network of 67 countries' IT associations. The Association plays the leading role in issues of IT industry concern, including information security, taxes and finance policy, digital intellectual property protection, telecommunications competition, workforce and education, immigration, online privacy and consumer protection, government IT procurement, human resources and e-commerce policy. ITAA members range from the smallest IT start-ups to industry leaders in the Internet, software, IT services, ASP, digital content, systems integration, telecommunications, and enterprise solution fields. For more information visit www.itaa.org.

Even if such profiles can be completed in the next few months, this would leave only 12 months or less to identify and certify testing facilities. The throughput for such lab testing has historically been slow and extremely costly. Industry would also need time to evaluate the profiles once completed; design and engineer the requirements the profiles create into products; and then begin manufacturing those newly designed products. This process on the part of industry would almost certainly miss the June 2008 implementation deadline. Industry would instead encourage NIST to consider options that would provide a timely and cost-effective mechanism for providing products to the government market.

To that end, we would encourage NIST to reject the concept of government managed testing as too costly, cumbersome and time-consuming given the factors and conditions mentioned above. Instead, we would encourage NIST and the government to develop and adopt a means to validate existing testing and evaluation already done as part of the development of products, coupled with some form of industry/government partnership to validate a self-certification mechanism for IPv6 products. Such a self-certification mechanism was very successful for Y2K efforts and could serve as a model for this initiative. In this fashion, government is immediately able to leverage the information and findings already available, meet the deadlines of the June 2008 implementation date and provide significant savings to the taxpayer.

Industry would also recommend that such a validation process for testing and evaluation of products should be evolutionary and not global from the beginning. Instead of testing and evaluating all products to the fullest capability, government can validate the basic functionality of products. Only as traffic begins to grow after June 2008 would there be a need to validate capabilities on a higher order.

In this fashion, the government would be able to validate products for use based upon existing testing and evaluation information and make those products available to the agencies and departments. This course of action would also allow government to viably meet the June 2008 implementation deadline.

It is our hope that these comments can help guide both the discussion at the public meeting on this topic on May 4, 2007 at NIST, as well as shape the government plans for testing and evaluation for IPv6 products. Should you have any questions, please do not hesitate to contact me at thodgkins@itaa.org or by calling 703-284-5310.

Sincerely,

A.R. “Trey” Hodgkins, III
Senior Director, Defense and Intelligence Programs